

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Village Farms, L.P.,

Plaintiff,

v.

Mill Village Farms, and Mill Village Ministries,

Defendant.

Case No. 6:15-cv-02623-MGL

**LOCAL CIVIL RULE 26.01
DISCLOSURE STATEMENT**

COMES NOW Plaintiff Village Farms, L.P., by and through its counsel, pursuant to Local Civil Rule 26.01, and submits the following responses to the Court's Local Rule 26.01 interrogatories:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: Not applicable.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Non-jury, based on the nature of relief sought.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Village Farms is majority held by parent corporation Agro Power Development, Inc., a Delaware corporation, which through a series of parent corporations is wholly owned by Village Farms International, Inc., a publicly-traded Canadian corporation.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to appropriateness of the division).

RESPONSE: Venue is proper in this District pursuant to 28 U.S.C. § 1391 because: (1) the Defendant is deemed to reside in this District because it is a district in which it is subject to personal jurisdiction; and (2) a substantial part of the events or omissions giving rise to the claims occurred in this District, and Plaintiffs' claims for relief arise from the unlawful conduct of the Defendants which occurred in or was directed to this District.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: No.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Plaintiffs believes that Defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: None known at this time.

Respectfully submitted,

By: /s/ Michael S. Cashman

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Attorneys for Plaintiff

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Greenville, South Carolina